

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

IN RE: AIDA ORTIZ ORTIZ Debtor	CASE NO. 10-08174 (SEK) CHAPTER 11
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ADDENDUM TO STIPULATION

TO THE HONORABLE COURT:

COME NOW, Aida Ortiz Ortiz, (“Debtor”), Tania Del Llano and Ian Del Llano (“the appearing creditors”), through their respective undersigned attorneys and very respectfully state and pray:

1. On February 8, 2011, the parties filed a Joint Motion Submitting Stipulation (“The Stipulation”). (Docket 61)

2. In the Stipulation the Debtor acknowledged and accepted as allowed the following claims in case 10-08174:

- a. Claim #12 in the amount of \$176,984.54
- b. Claim #13 in the amount of \$67,200.00
- c. Claim #14 in the amount of \$9,000.00
- d. Claim #15 in the amount of \$350,000.00

3. The parties further agreed that with the approval of the Stipulation Claims # 12, 13, 14 in case 10-08174, will be paid as general unsecured claims in equal treatment to all others general unsecured creditors under the Chapter 11 Reorganization Plan in both cases.

4. The parties further agreed in the Stipulation that Claim #15 in case 10-08174 will not receive distribution under Debtor's Chapter 11 Reorganization Plans, but the claim will remain if the cases are further dismissed or converted to liquidation under Chapter 7.

5. The parties herein wish to amend the Stipulation in order to provide that Claim #15 in the amount of \$350,000.00 be allowed to receive distribution under the plan up to \$3,000.00 as a general unsecured creditor under Class 4 of the Plan of Reorganization filed by the Debtor Aida Ortiz Ortiz.

6. The same will be paid within the same term as all other unsecured creditors under this class, that is sixty (60) months.

7. This addendum to the Stipulation, once approved, will be included as an integral part of the Stipulation and the proposed Plan of Reorganization. The Debtor is herein amending the payment plan schedule accordingly in order to reflect this change.

8. All other terms of the Stipulation remain unchanged and continue to prevail as the agreement between the parties.

NOTICE TO CREDITORS AND PARTIES IN INTEREST

You are hereby notified that the parties have filed the above Addendum to the Stipulation filed on February 8, 2011 at Docket 61. Any party objecting to the above detailed proposed settlement should file its objection on or before twenty one (21) days from the date hereof. If no objections are filed, this Addendum, along with the Stipulation will be approved by the Court without the need for a hearing.

WHEREFORE, the parties very respectfully request that this Honorable Court approve this Addendum to the Stipulation filed on February 8, 2011 at Docket 61.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 17th day of March 2011.

C. CONDE & ASSOC.

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Accepted:

S/Aida Ortiz Ortiz
Aida Ortiz Ortiz

s/ Tamiky Del Llano
Super Pet Center, Inc.
By: Tamiky Del Llano

S/ Tania Del Llano
Tania Del Llano

S/Ian Del Llano
Ian Del Llano

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the parties appearing in said system and I hereby certify that I have mailed by United States Postal Service the document to the non CM/ECF participants included in the master address list.

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